

Atlantic Richfield Company

Roy I. Thun
Environmental Business Manager

4 Centerpointe Drive
LaPalma, CA. 90623-1066
Office: (661) 287-3855
Fax: (661) 222-7349
E-mail: Roy.Thun@bp.com

October 5, 2007

CERTIFIED – RETURN RECEIPT REQUESTED

Mr. Jim Sickles and Ms. Nadia Hollan-Burke
Remedial Project Managers
U.S. Environmental Protection Agency Region 9
75 Hawthorne Street, SFD-8-2
San Francisco, CA 94105

**Subject: September 2007 Monthly Report, Yerington Mine Site, Lyon County, Nevada:
Administrative Order for Remedial Investigation and Feasibility Study, EPA Docket
No. 9-2007-0005**

Dear Mr. Sickles and Ms. Hollan-Burke:

Pursuant to the above referenced order issued by the U.S. Environmental Protection Agency (EPA), please note the following monthly status report for Atlantic Richfield Company (ARC) activities at the Yerington Mine Site during September 2007.

Operations, Maintenance and Site Security

- Pumpback well system averaged approximately 60.8 gpm; all 11 wells operated 24/7 with minor downtime for preventive maintenance (wells PW-3, PW-4 and PW-7).
- Arimetco heap leach fluid management system (FMS) operations continued. Total estimated gallons transferred from VLT Pond to Evaporation Pond = 198,000 gal. SSP to VLT Pond = 0 gal; SSP to Evaporation Pond = 0 gal; Plant Feed to Evaporation Pond = 0 gal; Raff sump to Phase 1 Pond = 0 gal. Pond levels: Evaporation Pond = 3.0 ft; VLT Pond = 8 ft; Slot 2 Pond = 7 ft. Phase I, Plant Feed and Mega ponds are dry.
- Electrical contractor replaced stolen VLT pond pump electrical components. VLT pond pump back in service September 25.

Other Site Activities

- EPA personnel and various EPA contractors on site September 5, 6, 10, 26, and 27.
- Joe Sawyer (NDEP) on site with EPA September 10.
- Stan Weimeyer (USFWS) conducted bird count on September 27.

Site Characterization

- Continued 3Q 2007 groundwater sample analysis data QA/QC process.
- Conducted 3Q 2007 groundwater re-sampling event for 11 wells on September 24-27 (letter describing reasons for re-sampling submitted to EPA September 28).

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Site Characterization (continued)

- Site-wide monthly groundwater elevation measurements completed September 28.
- Submitted an electronic version to EPA of the revised Air Quality Monitoring Work Plan (version 2) dated September 12, 2007 with updated correspondence in Appendix A (a complete set of EPA signed correspondence was not available for this submittal).
- Submitted responses to EPA comments on September 24, 2007 for the draft Data Management PM10 monitoring, and high volume PM10 Events 159 to 163. Conducted Plan (DMP) dated July 26, 2007, which were not submitted with the revised DMP.
- As part of DMP implementation, initiated programming to identify results exceeding pre-determined limits for groundwater sampling and subsequent notification of ARC project managers and scoping data management O&M and internal audits.
- Continued air quality monitoring (AQM) program to include meteorological monitoring, continuous quarterly maintenance on high volume PM10 samplers, and semi-annual maintenance on continuous PM10 monitors and meteorological equipment. Provided a tour of the AQM facilities to EPA and stakeholders on September 5, 2007.
- Received EPA approval to terminate high volume air sampling following high volume Event 163 on September 27, 2007.
- Submitted 2Q 2007 Air Quality Monitoring Report on September 20, 2007, which included meteorological and air quality data collected during the dust storm event on June 5, 2007.
- Reviewed EPA comments to the Conceptual Site Model (CSM) on September 5, 2007.
- Continued the phyto-remediation pilot study.
- Requested an extension from November 6 to December 7, 2007 for the submittal of the draft Pit Lake RI Work Plan. Received EPA approval of same on September 13, 2007.
- Continued preparation of the draft Data Summary Report for the Background Soils Work Plan.
- Continued the 2nd Step HFA drilling, zonal sampling and well installation program including the completion of monitor wells B/W-29, 3S and 3I.
- As part of 2nd Step HFA program, installed the pit lake pressure transducer and surveyed the pit lake elevation on September 26, 2007. The pit lake elevation at the time of the installation (1:26 pm on 9/26/07) was 4,213 feet amsl.
- Discussed EPA comments on the draft Site-Wide Groundwater RI Work Plan in a conference call on September 27, 2007.
- Received EPA comments dated September 21, 2007 on the draft Interim Anaconda Evaporation Ponds Work Plan and previous ARC responses to comments. Initiated responses to these comments and, as requested by EPA, the preparation of two documents that will replace the draft Interim Anaconda Evaporation Ponds Work Plan: draft Removal Action Work Plan for the Lined Anaconda Evaporation Ponds and the Pumpback System Evaporation Ponds and the draft Screening Level Ecological Risk Assessment (SLERA) for the Evaporation Ponds Area. ARC's counsel has initiated discussions with EPA's counsel as to whether EPA intends to order an interim response action for the evaporation ponds and, if so, requests EPA to make this demand in accordance to proper CERCLA / NCP notification requirements.
- Continued wildlife observation activities (field surveys and camera trap photo-documentation); performed camera trap maintenance; development of quarterly wildlife patrol report, based on routine Site patrols.

Planned October 2007 Activities

- Continue routine O&M and site security activities; schedule site road maintenance.
- Continue 3Q 2007 groundwater sample analysis QA/QC process.
- Continue preparation of the Data Summary Report for Background Soils



Planned October 2007 Activities (continued)

- Continue the 2nd Step HFA program including aquifer materials sampling at the B/W-11 site.
- Submit revised CSM on October 5, 2007.
- Submit letter requesting modifications to existing and future monitor well nomenclature.
- Continue the phyto-remediation pilot project.
- Continue revised AQM program including the elimination of high-volume sampling.
- Provide EPA properly orders ARC to do so: 1) prepare and submit the draft Removal Action Work Plan for the Lined Anaconda Evaporation Ponds and the Pumpback System Evaporation Ponds; and 2) develop the SLERA for the area of these evaporation ponds.
- Prepare letter request for EPA approval of, and implement (if approved), field investigation to estimate the volume of sediments in the Lined Anaconda Evaporation Ponds relative to the draft Removal Action Work Plan (provided EPA properly orders ARC to perform such work).
- Respond to EPA comments on the draft Site-Wide Groundwater RI Work Plan (submittal schedule to be determined by EPA relative to the submittal date of the revised RI Work Plan).
- Continue the wildlife observation program on the site, including photo-documentation in the area of the evaporation ponds and sewage treatment ponds at the northern portion of the site.
- Participate in the Yerington Technical Group meeting conference call in mid-October on the DQOs for the Pit Lake RI Work Plan.

If you have any questions or comments, please feel free to contact me at (661) 287-3855 or via e-mail at Roy.Thun@bp.com.

Sincerely,

Chuck Zimmerman for
Roy Thun
Environmental Business Manager

cc: Mike Montgomery, EPA – via electronic mail
Sheryl Bilbrey, EPA – via electronic mail
Joe Sawyer, NDEP – via electronic mail
Tom Olsen, BLM – via electronic mail
Dan Newell, City of Yerington Manager – via electronic mail
Phyllis Hunewill, Lyon County Commissioner – via electronic mail
Chris Winsor, Atlantic Richfield Company - via electronic mail
Todd Normane, Atlantic Richfield Company – via electronic mail
John Batchelder, Atlantic Richfield Company – via electronic mail
Jim Chatham, Atlantic Richfield Company – via electronic mail
Stacey Waterman, Atlantic Richfield Company – via electronic mail
Rich Curley, Holland & Hart – via electronic mail
Chuck Zimmerman, Brown and Caldwell
Ed Schneider, Norwest Applied Hydrology – via electronic mail
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